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*Attorneys for Defendants Thomson S.A. and
Thomson Consumer Electronics, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

Sharp Electronics Corp. et al. v. Hitachi, Ltd. Et al., No. 13-cv-01173

**DECLARATION OF JEFFREY S.
ROBERTS IN SUPPORT OF
STIPULATION AND PROPOSED ORDER
RE EXTENSION OF BRIEFING
SCHEDULE**

[STIPULATION AND [PROPOSED] ORDER
RE EXTENSION OF BRIEFING SCHEDULE
FILED CONCURRENTLY HEREWITH]

1 I, Jeffrey S. Roberts, hereby declare under penalty of perjury as follows:

2 1. I am an active member in good standing of the bar of the State of Colorado and on July 31,
 3 2013 I was granted leave to appear *pro hac vice* [Dkt. No. 1819]. I am an attorney with the firm
 4 Faegre Baker Daniels LLP, counsel to Defendants Thomson S.A. and Thomson Consumer
 5 Electronics, Inc. (“Thomson Consumer”). I submit this declaration in support of Thomson
 6 Consumer’s Stipulation and Proposed Order regarding Extension of Briefing Schedule in relation to
 7 Plaintiffs Sharp Electronics Corp. and Sharp Electronics Manufacturing Company of America,
 8 Inc.’s (collectively, “Sharp’s”) Objections to Special Master Legge’s Order Staying Discovery.

9 2. On March 15, 2013, Sharp filed its Complaint against Thomson Consumer and Thomson
 10 S.A.

11 3. On May 17, 2013, Thomson Consumer filed a Motion to Dismiss [Dkt. No. 1677] the claims
 12 alleged against it in the Sharp’s Complaint pursuant to Fed. R. Civ. P. 12(b)(6). The Motion to
 13 Dismiss is fully briefed and awaiting a hearing. The hearing will be rescheduled pending a ruling
 14 from Judge Conti on pending appeals of the Special Master’s orders on the motions to dismiss of
 15 other direct action defendants.

16 4. On August 9, 2013, Sharp filed its Objections to Special Master Legge’s Order Staying
 17 Discovery against Thomson Consumer. No hearing on this matter is currently set.

18 5. On August 15, 2013 I contacted Blaise Warren and Craig Benson, both counsel for Sharp,
 19 by email and requested an extension of time for Thomson Consumer to file its response to Sharp’s
 20 Objections to Special Master Legge’s Order Staying Discovery necessitated by the fact that
 21 Thomson Consumer’s attorneys are currently engaged in numerous depositions in an unrelated
 22 matter. That same day, I contacted Mr. Warren by telephone and further discussed the requested
 23 extension with him. Less than one hour later, Mr. Warren informed me by email that Sharp agrees
 24 that the deadline for Thomson Consumer to file its response would be extended from August 16,
 25 2013 until August 26, 2013.

26 6. No party will be prejudiced by this brief extension of time for Thomson Consumer to file its
 27 response to Sharp’s Objections to Special Master Legge’s Order Staying Discovery, nor will this
 28 extension adversely impact the schedule of this case.

1
2 Executed this August 16, 2013 at Denver, Colorado.
3

4
5
6 /s/ Jeffrey S. Roberts
7

8 Jeffrey S. Roberts
9

10 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has
11 been obtained from the above signatory.
12

13 Dated: August 16, 2013
14

15 By: /s/ Calvin L. Litsey
16